

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

KESIA PRICE, Individually and on Behalf
of All Other Persons Similiarly Situated,

Plaintiffs,

-against-

PORTER NOVELLI, INC. and OMNICOM
GROUP, INC.,

Defendants.

Crotty, T

USDS SDNY
DOCUMENT
ELECTRONICALLY FILED
DOC #:
DATE FILED: APR 28 2008

07 Civ. 5869 (PAC)

Second
AMENDED CASE
MANAGEMENT PLAN AND
SCHEDULING ORDER

The Civil Case Management Plan and Scheduling Order dated and filed September
18, 2007 is hereby supplemented and amended as follows:

- (1) + Paragraph 5 and 13 are hereby amended: All fact discovery shall be completed no later than June 13, 2008.
- (2) + Paragraphs 6(c) and 13 are hereby amended: Depositions to be completed by June 13, 2008.

(3) + Application GRANTED. The next PTC is scheduled for Wednesday,
6/11/08 at 2:45 pm in Courtroom 20-C

SO ORDERED:

Paul A. Crotty
HON. PAUL A. CROTTY
UNITED STATES DISTRICT JUDGE

Dated: New York, New York
April 28, 2008

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April 25, 2008

VIA E-MAIL

The Honorable Paul A. Crotty
United States District Court for the
Southern District of New York
500 Pearl Street, Room 735
New York, New York 10007

*Re: Price v. Price Novelli, Inc., et al.
07 Civ. 5869(PAC)*

Dear Judge Crotty:

We represent the plaintiff in the above-referenced FLSA putative collective action. This letter is submitted in response to the Court's inquiry and request for the parties to submit a proposed supplemental discovery schedule. Attached is a proposed Order amending the relevant dates of Your Honor's prior Case Management Order. All parties have consented to the entry of the attached proposed Order.

Discovery has been proceeding in this case. We have completed the 30(b)(6) deposition of Defendant Omnicom Group Inc., and we conducted a deposition last week of a former employee of Defendant Porter Novelli, Inc. As a result of Your Honor's ruling during that deposition sustaining certain objections made by Defendants' counsel, Plaintiff will make an application, as Your Honor allowed, seeking reversal of that ruling. We have just recently received that deposition transcript and can make that application at the beginning of the coming week.

Defendants are also considering an additional request by Plaintiff to supplement and/or amend their document production. We anticipate that this issue will be resolved without any need for Court intervention.

Thank you for your time and consideration in this matter.

Respectfully submitted,

Andrew P. Bell (AB-1309)

APB/am

cc: John D. Shyer, Esq. (via email)
Amy S. Donovan, Esq. (via email)